

# SMITH | VILLAZOR

Smith Villazor LLP  
250 West 55th Street, 30th Floor  
New York, NY 10019  
www.smithvillazor.com

**RODNEY VILLAZOR**

T 212 582 4400

D 212 377 0852

rodney.villazor@smithvillazor.com

May 28, 2021

**VIA ECF**

Honorable Michael A. Hammer  
United States District Court for the  
District of New Jersey  
Martin Luther King Courthouse  
50 Walnut Street Room 2C  
Newark, NJ 07101



**Re:   *United States v. Matthew Goettsche, et al.*, 19-CR-877 (CCC)  
Proposed Addition of Third-Party Custodian**

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion on behalf of Defendant Matthew Goettsche. We respectfully move to add Sandra Anne Crain, Mr. Goettsche's mother-in-law, as an additional third-party custodian. On December 11, 2020, the Court ordered Mr. Goettsche released on bail conditions, including the pretrial release condition that he shall be released to the custody of third-party custodians Danielle Goettsche or Victoria Landerman. *See* Order Setting Conditions of Release (dkt. 171).

U.S. Pretrial Services Officer David Hernandez has approved Ms. Crain as a suitable third-party custodian. I have reviewed each of the terms of the bail conditions with Ms. Crain. She understands and accepts her responsibilities as a third-party custodian. The U.S. Attorney's Office takes no position on our letter motion and defers to Pretrial Services.

Thank you in advance.

Respectfully submitted,

Rodney Villazor, Esq.  
SMITH VILLAZOR LLP

Hon. Michael A.  
Hammer May 28, 2021  
Page Two

I agree to (a) supervise Mr. Goettsche in accordance with all conditions of release, (b) to use every effort to assure the appearance of Mr. Goettsche at all scheduled court proceedings, and (c) to notify the court immediately in the event Mr. Goettsche violates any conditions of release or disappears.

  
Sandra Anne Crain

cc: Andrew Lourie, Esq.  
Benjamin Sauter, Esq.  
Amanda Tuminelli, Esq.  
Government counsel of record (via ECF and e-mail)  
U.S. Pretrial Services Officer David Hernandez (via e-mail)  
U.S. Pretrial Services Officer Troy Ruplinger (via e-mail)

SO ORDERED  
6/2/2021  
s/Michael A. Hammer  
Hon. Michael A. Hammer